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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IYO, INC.,

Plaintiff,

vs.

IO PRODUCTS, INC., OPENAI, INC.,
OPENAI, LLC, SAM ALTMAN, and SIR
JONATHAN PAUL IVE,

Defendants.

Case No. 3:25-cv-04861

**NOTICE OF LODGING OF DOCUMENT
UNDER SEAL**

Judge: Hon. Trina L. Thompson

1 Pursuant to the Court's June 17, 2025 Minute Order (Dkt. 41) regarding the hearing on
2 Plaintiff's Motion for Temporary Restraining Order, Defendants submit the attached Declaration
3 under seal.

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6 Dated: June 18, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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9 By: /s/ Margret M. Caruso

Margret M. Caruso

10 *Attorneys for Defendants io Products, Inc.,*
11 *OpenAI, Inc., OpenAI, LLC, and Sam Altman*
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CERTIFICATE OF SERVICE

I, Andrew Mather, declare as follows:

I am over the age of eighteen and not a party to this action. Pursuant to Civil Local Rules 79-5(c) and 79-5(f), I hereby certify that on June 18, 2025, complete, unredacted PDF copies of Defendants forgoing **NOTICE OF LODGING**, along with the accompanying **DECLARATION OF MEHRA MASSOUDI**, were served by me on counsel of record for all parties via electronic mail.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California.

Dated: June 18, 2025



Andrew Mather